

NAGARJUNA OIL REFINERY LIMITED

Whistle Blower Policy

The Company has introduced / formalised an internal policy, to be known as the 'Whistle Blower Policy' to enable employees of the company, at all levels, to voice any concern against any malpractice or wrongdoing in the course of the company's dealings or day to day transactions.

The Policy has been envisaged to enable any employee noticing any malpractice, wrongdoing, impropriety, abuse of person or position, unethical or illegal conduct within the organisation, to disclose the same internally without the fear of any victimisation or reprisal.

The policy is aimed to encourage employees to express their concern over any malpractice or wrongdoings and help redress such concerns rather than just tolerating or overlooking such internal concerns.

The Policy provides a firm assurance that an employee raising a genuine / bona-fide concern under this policy will not be under a threat of loss of job, suspension, or any other kind of victimisation, discrimination or disadvantage. The policy assures that the company will take all necessary steps to protect an employee who raises a concern in good faith, against any attempt of victimisation or discrimination.

While the policy encourages employees to indicate his/her name while disclosing any concern under this policy, the company assures that it will not disclose the identity of such employee, without his/her concern. Anonymous information may not be treated very seriously, but the company would still consider making an investigation on matters based on such anonymous information.

The policy does not provide a comprehensive list or definition of what constitutes Malpractice, Wrongdoing, abuse etc., but attempts to enumerate a few instances of such instances so as to indicate what issues / concerns could be raised under the policy, as under:

1. Any, Fraud, misfeasance, corruption or malpractice.
2. Any unlawful or illegal act, whether of criminal or civil nature.
3. Abuse of power / position and Abuse of persons (child and adult).
4. Breach of health and safety measures, company's accepted Code or Manual, causing hazards to environment.
5. Unethical or improper conduct, mis-appropriation of company's funds.
6. Frequent / regular Failure or neglect to perform once official duties and failure to company with legal and statutory obligations.

Procedure for Disclosure, Investigation and consequent Disciplinary Action

An employee intending to disclose a concern under this policy shall in writing, disclose all the relevant information and sign the document with his name, department and employee number. An employee making a disclosure is not expected to prove his case or produce any written or oral evidence.

An employee intending to disclose a concern under this policy may email the information to Ms. Ankita Mathur, Company Secretary and Compliance Officer of the company and who is also the Secretary of the Audit Committee of Directors, at mankita@nagarjunagroup.com or post the same to the following address:

Ankita Mathur
Company Secretary & Compliance Officer
Nagarjuna Oil Refinery Limited
Nagarjuna Hills, Punjagutta,
Hyderabad – 500 082

The matter / concern would be placed before the Audit Committee for necessary instructions on the matter.